

Alan D. Halperin, Esq.
Walter Benzija, Esq.
Donna H. Lieberman, Esq.
HALPERIN BATTAGLIA RAICHT, LLP
555 Madison Avenue – 9th Floor
New York, New York 10022
(212) 765-9100

Hearing Date: December 16, 2008
Hearing Time: 10:00 a.m.
Objection Deadline: December 11, 2008
4:00 p.m.

*Counsel to Mapco Express, Inc.
and Delek US Holdings, Inc.*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

Chapter 11

LEHMAN BROTHERS HOLDINGS INC.,
et al.

Case No. 08-13555 (JMP)

(Jointly Administered)

Debtors.

**NOTICE OF MOTION OF MAPCO EXPRESS, INC.
AND DELEK US HOLDINGS, INC.
FOR RELIEF FROM THE AUTOMATIC STAY**

PLEASE TAKE NOTICE that, upon the annexed motion (the “Motion”), Mapco Express, Inc. and Delek US Holdings, Inc. (together, the “Movants”), by and through their attorneys, Halperin Battaglia Raicht, LLP will move before the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, on **December 16, 2008 at 10:00 a.m.** (the “Hearing”), or as soon thereafter as counsel can be heard, for entry of an order pursuant to section 362(d) of title 11 of the United States Code (the “Bankruptcy Code”) granting the Movants relief from the automatic stay, for the reasons more fully set forth in the Motion.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the relief sought in the Application must be in a writing, conform to the requirements of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Bankruptcy Rules for the Southern District of New York, and must be filed (a)(i) through the Bankruptcy Court's electronic filing system (in accordance with General Order M-182), which may be accessed (with a password which is available by contacting the Bankruptcy Court's technical assistance at (212) 668-2870, ext. 3522, Monday through Friday, 8:30 a.m. to 5:00 p.m.) through the Internet at the Bankruptcy Court's website at: www.nysb.uscourts.gov, using Netscape Navigator software version 3.0 or higher, and (ii) in portable document format (PDF) using Adobe Exchange software for conversion; or (b) if a party is unable to file electronically, such party shall submit the objection in PDF format on a diskette in an envelope with the case name, case number, type and title of document, document number of the document to which the objection refers, and the file name on the outside of the envelope; or (c) if a party is unable to file electronically or use PDF format, such party shall submit the objection on diskette in either Word, WordPerfect, or DOS text (ASCII) format. An objection filed by a party with no legal representation shall comply with section (b) or (c) as set forth in this paragraph. A hard copy of the objection, whether filed pursuant to section (a), (b) or (c) as set forth in this paragraph, shall be delivered directly to the Chambers of the Honorable James M. Peck, at the above address, so as to be received no later than **December 11, 2008 at 4:00 p.m.** The objection shall be served in accordance with General Order M-182 so as to be **received** no later than

that date by: (a) Halperin Battaglia Raicht, LLP, attorneys for the Movants, 555 Madison Avenue, 9th Floor, New York, New York 10022, Attn: Walter Benzija, Esq. and Donna H. Lieberman, Esq.

Dated: New York, New York
November 21, 2008

HALPERIN BATTAGLIA RAICHT, LLP

By: /s/Alan D. Halperin
Alan D. Halperin, Esq.
Walter Benzija, Esq.
Donna H. Lieberman, Esq.
555 Madison Avenue, 9th Floor
New York, New York 10022
(212) 765-9100